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March 27, 2020

Via Email

The Honorable Kimba M. Wood
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, New York 10007-1312

Re: *United States v. Dean Skelos,*
S1 15 Cr. 317 (KMW)

Dear Judge Wood:

As Your Honor knows, we represent Dean Skelos. We write to supplement our earlier letter of March 27, 2020 in order to provide the Court with critical new information that has just now come to light.

We understand that just today the guards in the satellite camp at FCI Otisville informed the inmates, including Mr. Skelos, that another inmate has tested positive for coronavirus. That individual fainted in the shower approximately one week ago and, since that incident, has been held in the Segregated Housing Unit. Thus far, the guards have taken the temperatures of the other inmates in the camp but have enacted no further safety measures. This new revelation amplifies each of the arguments raised in our first letter. Considering his age and

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medical condition, Mr. Skelos needs the chance to quarantine at home and escape the glaring risk this virus presents.

Respectfully submitted,

/s/ G. Robert Gage Jr.

G. Robert Gage, Jr.

/s/ Alexandra Shapiro

Alexandra Shapiro

Shapiro Arato Bach LLP

cc: All Counsel of Record (via email)